

Honorable Julius Genachowski, Chairman  
Commissioner Michael J. Copps  
Commissioner Robert M. McDowell  
Commissioner Mignon Clyburn  
Commissioner Meredith Attwell Baker  
Federal Communications Commission  
445 Twelfth Street SW  
Washington, DC 20554

Re: CG Docket Nos. 03-123 and 10-51

Dear Chairman Genachowski and Commissioners Copps, McDowell, Clyburn, and Baker,

I submit this letter of concern to you and my representatives in Congress regarding the National Exchange Carrier Association's (NECA) recent recommended payment formula (Public Notice DA 10-76A1.doc), and the threat it poses to real and meaningful functionally equivalent telecommunications for Deaf and hard-of-hearing people.

I encourage the FCC to consider outreach, research and development, and equipment costs in their rate formula. The proposed formula cannot sustain current levels of service; let alone continue progress toward the statutory goal of functionally equivalent telecommunications.

The proposed formula is detrimental to interpreters who serve as Communication Assistants (CAs) in that it does not consider their training and professional development as necessary elements in creating functionally equivalent telecommunications.

I find the proposed formula as unfair and inequitable, whereby creating the perception of market manipulation, and unnecessarily bringing into question the intentions of the FCC in its efforts towards satisfying functional equivalence for the Deaf and hard-of-hearing.

As a child of deaf parents, I want to believe that you have my parent's best interests in mind when making your decision. As a professional interpreter of over 20 years, I want to believe you have my colleagues in mind when making your decision. As the employee of a VRS provider, I want to believe you support a fair and equitable market.

In summary, I encourage you to establish a rate that sustains, if not improves upon, the current level of service; promotes the quality of interpreting services; and creates a healthy market place - all toward the goal of creating real and meaningful functionally equivalent telecommunications for Deaf and hard-of-hearing people.

Sincerely,

Bruce King